

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)
)
)
v.) CR. NO. 2:06CR155-MHT
)
)
QUINTRELL MARTIN)

MOTION FOR REDUCTION IN SENTENCE
PURSUANT TO RULE 35 FEDERAL RULES OF CRIMINAL PROCEDURE

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, pursuant to Rule 35(b) *Federal Rules of Criminal Procedure*, and respectfully requests that the sentence imposed on Defendant Quintrell Martin be reduced for the following reasons:

1. Defendant Quintrell Martin was sentenced by this Honorable Court to the custody of the Bureau of Prisons to be imprisoned for a term of 120 months. Martin was convicted of one count of being a felon in possession of a firearm.
2. The United States herein states that since being sentenced, Quintrell Martin has made a good faith effort to provide substantial assistance in the investigation and prosecution of other persons who have committed criminal offenses in the Middle District of Alabama and elsewhere. The nature and extent of Martin's assistance is set forth below.
3. According to Scott Green, Deputy District Attorney for the Fifteenth Judicial Circuit, Martin has been instrumental in the successful prosecution of multiple murder cases investigated by the State of Alabama. Specifically, Martin testified twice in the case of State v. Anthony Cowart and he testified in the case of State v. Michael Gray.

Both prosecutions resulted in convictions and substantial sentences for the defendants. In addition to testifying in these cases, Martin's information was useful in negotiating plea agreements with other defendants.¹

3. The United States submits that Martin has been truthful with the United States and to the law enforcement officers that he has been assisting.

4. The United States submits that some degree of risk of injury to Quintrell Martin and his family has resulted and continues to result because of his assistance.

Wherefore, premises considered, the United States moves this Honorable Court for a reduction of eighteen (18) months from the sentence of imprisonment previously imposed on Quintrell Martin, resulting in a sentence of 102 months imprisonment.

Respectfully submitted this the 31st day of October, 2007.

LEURA G. CANARY
UNITED STATES ATTORNEY

s/ Verne H. Speirs
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See Exhibit "A"- letter dated August 6, 2007 from Deputy District Attorney Scott Green.

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Richard Keith.

LEURA G. CANARY
UNITED STATES ATTORNEY

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